

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

REENA S. MATHEW,
Plaintiff

v.

SANTANDER CONSUMER USA INC.,
Defendant

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§

Civil Action No. 3:23-cv-01494-N

PLAINTIFF'S AMENDED EXHIBIT LIST

Plaintiff Reena S. Mathew submits the following (attached) list of the exhibits she plans to offer into evidence at trial, or before trial should the Court decide to pre-admit exhibits:

Respectfully submitted,

/s/ Donald E. Uloth
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CERTIFICATE OF SERVICE

I certify that on January 31, 2025 I am filing this motion electronically using the Court's ECF filing system, which will email a file-marked copy of this motion to all counsel of record.

/s/ Donald E. Uloth
Donald E. Uloth

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

REENA S. MATHEW,	§	
Plaintiff	§	
	§	
v.	§	Civil Action No. 3:23-cv-01494-N
	§	
SANTANDER CONSUMER USA INC.,	§	
Defendant	§	

PLAINTIFF’S AMENDED EXHIBIT LIST

No.	Description
1.	Offer letter SC 771-772
2.	Progressive Discipline Policy 2013 SC 10464-10470
3.	Job description, Human Resources Business Partner SC 8348-8350
4.	2012 Annual Objectives SC 987-990
5.	2014 Santander Performance Review (Reena Mathew) SC 121-138
6.	2015 Mid-Year Review Mathew 5-9
7.	Email re Confidential - Performance Review Feedback SC 44-45
8.	Emails re Termination Tyrone Wilson SC 1449-50
9.	IMs between Mathew and Hullum SC 2732
10.	Emails re Byron N. SC 1013-1014
11.	Emails re 2015 goals SC 3093-3094
12.	Emails re Perfect Attendance Question SC 4015-4017
13.	Email Hullum to Mathew re Reallocation of duties SC 758-759
14.	Emails re HR Business Partner Model SC 4138-4139

15.	IMs between Mathew and Hullum Mathew 256-257
16.	Email re HR Org Chart – Updated (plus the attached chart) SC 10106-10111
17.	Elad broadcast email re HR Org Change Announcement SC 8380-8381
18.	Outlook calendar documents scheduling an introductory meeting between Mathew and Adriano for 8/26/15 SC 3993 and SC 3994
19.	Email Mathew to Adriano re PTO Request SC 6972
20.	Email from Yessica Adriano re Team Meeting Recap SC 5719
21.	Emails re New Leadership SC 5763-5764
22.	Emails re Perfect Attendance Proposal, plus attachment SC 3244-3246
23.	Emails re Perfect Attendance Proposal SC 5798
24.	Emails re Perfect Attendance Proposal plus attachment SC 5709-5710
25.	Emails re Perfect Attendance Proposal SC 7518
26.	Emails re Perfect Attendance Proposal Mathew 3-4
27.	Email re DA's SC 4074
28.	IMs between Mathew and Adriano ECF Doc. 25, App.174 [this page has no Bates number]
29.	Emails re Investigation Checklist (5) SC 5492
30.	Emails re Perfect Attendance Proposal Mathew 282-284
31.	Emails re Investigation Template SC 5910-5913
32.	IMs between Mathew and Adriano SC 2773
33.	IMs between Mathew and Adriano SC 2752
34.	Emails re Loss Recovery Team - LEW SC 9926
35.	Email Elad to Blackburn re Reena Mathew - Confidential SC 1690
36.	Email Elad to Whatley (no subject) SC 7514

37.	Emails re Reena: Workload SC 6293-6294
38.	Email Adriano to Elad re Time Line of Events (plus attachment) SC 5252-5255
39.	Emails re PTO Mathew 17-18
40.	Email Hullum to Adriano re Reena SC 7444-7456
41.	Email Adriano to Elad re Reena PIP SC 5408-5409
42.	Performance Improvement Plan SC 1154-1156
43.	Email Adriano to Elad re Reena SC 1056-1057
44.	Email Elad to Blackburn re Reena Mathew SC 1691
45.	Email Adriano to Elad re Time Line of Events SC 7206-7209
46.	Email Mathew to Elad re Meeting SC 3927
47.	Emails re Reena SC 7441
48.	Email Mathew to Watley re Hello SC 1709
49.	Emails re Herman Mathew 34-37
50.	Emails re Hello. SC 1710-1711.
51.	Emails re Reena Mathew – Confidential SC 1702-1703
52.	Email Mathew to Shaffer re Thank You Mathew 38-39
53.	Emails re Leave Early Requests SC 1119
54.	Email Mathew to Adriano re Recap of Conversation with Deirdre Crouch SC 3215
55.	Emails between Mathew and Blackburn re Hello SC 3123-3124
56.	Email from Elad to Blackburn re Meeting with Reena - Notes SC 1120-1121
57.	Emails between Elad and Hullum re Reena SC 1118
58.	Email Adriano to Mathew re Follow up SC 1153
59.	Emails re Reena Notes SC 928-930

60.	Emails re Thank You SC 2909-2910
61.	Emails re Reena Mathew SC 4970-4972
62.	Emails between Blackburn and Shaffer re Default Deadline Reminder SC 4984-4985
63.	Email Adriano to Elad re D. Crouch - Investigation Summary SC 5429-31
64.	Emails re Investigation Material SC 8463
65.	Emails re Investigation Material SC 4801
66.	Emails re D. Crouch - Investigation Summary- CONFIDENTIAL SC 9897-9899
67.	Emails re Perfect Attendance Proposal SC 3530-3531
68.	Emails re Reena – Dr. Appt. SC 757
69.	Email from Shaffer re Reena SC 5112
70.	Final Report for HR. SC 21-30
71.	Emails re Holiday Pay Mathew 42-44
72.	Emails re Holiday Pay SC 4058-4060
73.	Emails re Approval FMLA for Reena Mathew EMPID 103696 SC 666-668
74.	Emails re Reena Mathew SC 4983
75.	Emails re R. Mathew SC 14-15
76.	Emails re Update and next steps regarding your issues SC 3410
77.	Emails re: Headcount SC 9165-9166
78.	Emails re 8585 Coverage SC 6502
79.	Email Adriano to Elad re Updated PIP and Action Plan- Use this one SC 6306
80.	Email Adriano to Elad re Updated PIP and Action Plan- Use this one SC 6306
81.	Emails between Adriano and Elad re Reena – Docs SC 6892
82.	90 Day Action Plan (a draft) SC 10330

83.	90 Day Action Plan Mathew 47-48
84.	Performance Improvement Plan and Timeline of Events Mathew 49-55
85.	Emails re Meeting you requested (plus attachment) SC 4169-4176
86.	Emails re Reena Meeting Recap 01/15/16 SC 1053-1054
87.	Emails re Last Chance to Register for February Monthly Luncheon SC 747-750
88.	Emails re Perfect Attendance Proposal SC 6481-6482
89.	Email Shaffer to Mathew re Reminder SC 5102
90.	Emails Mathew to Adriano re Appts/Time Off Mathew 84-85
91.	Emails re Summary of our conversation from last Wednesday SC 275-281
92.	Letter from Gabrielle Klepper to Monte Hurst Mathew 81-83
93.	Email Mathew to Adriano re Summary of Meeting SC 4104
94.	Emails re Summary of Meeting SC 6812-6813
95.	Email Adriano to Mathew re Example of Investigation summary- confidential SC 6694-6696
96.	Letter from Monte Hurst to Gabrielle Klepper Mathew 86
97.	Investigation Notes re Rosalinda Coronado interview SC 2971
98.	Email Mathew to Adriano re Investigation Summary SC 2955-2956
99.	IMs between Mathew and Adriano SC 2648-2649
100.	Emails re Reena Meeting Recap 01/15/16 SC 662-664
101.	Emails re Term SC 9264-9265
102.	Emails to Catessa Malone SC 6838, 6606-6607, 6550-2, 6276, 5919, 5484-5486, 4776
103.	Emails re Investigation Summary SC 8291-8293
104.	Email Mathew to Adriano re Recap SC 3260
105.	Emails between Mathew and Adriano re Recap SC 1079-1080

106.	Emails re Recap SC 2937-2940
107.	Emails re Recap SC 4026-4028
108.	Emails re Recap SC 687-689
109.	Emails re Reena 90 Day Action Plan SC 6415
110.	Emails re Reena 90 Day Action Plan SC 9172-9173
111.	Emails re Revised SC 6503-6504
112.	30 Day Review 6924-6932
113.	Email Mathew to Adriano re Recap of Meeting SC 2100
114.	Emails re Attendance Recognition Program SC 9502-0503
115.	Emails re Attendance Recognition Program SC 6781-6783
116.	Emails re Attendance Recognition Program SC 2215-2216
117.	Emails re Attendance Recognition Program SC 6385-6386
118.	Emails re Attendance Report SC 2177-2178
119.	Emails re Attendance Report SC 657-658
120.	Emails re Attendance Report SC 7005-7007
121.	Emails re Attendance Report SC 6575-6582
122.	Emails re Attendance Report Mathew 291-296
123.	Emails re Recap of Meeting SC 10116-10117
124.	Emails re Recap of Meeting SC 8015-8016
125.	Emails re Recap of Meeting SC 5971-5972
126.	Emails re Recap of Meeting SC 9550-9552
127.	Emails re Recap of Meeting SC 5740-5471
128.	Email Mathew to Adriano re Recap SC 2148-2149

129.	Emails re Attendance Report. Mathew 297-305
130.	Emails re Recap SC 6937-6938
131.	Emails re Recap SC 5685-5686
132.	Emails re Recap SC 5259-5260
133.	Emails re Recap SC 6633-6634
134.	Emails re Attendance Recognition Program SC 2038
135.	Emails between Elad and Shaffer re Reena SC 9308
136.	Emails re Attendance Recognition Program SC 2515-2516
137.	Email Adriano to Elad re LEW Crew SC 5211
138.	IMs between Mathew and Adriano SC 4245
139.	Email Adriano to Elad SC 5759
140.	IMs between Mathew and Adriano SC 2635-2636
141.	Email Mathew to Adriano re Investigation Summary--Brittany Brodie Mathew 320-321
142.	Emails re Investigation Summary--Brittany Brodie SC 4461-4462
143.	Email Adriano to Elad re Investigation Summary--Brittany Brodie SC 6687-6688
144.	Email Adriano to Elad re Investigation Summary--Brittany Brodie SC 6353-6354
145.	Emails re Brittany Brodie- Term Recommendation SC 7979-7981
146.	Emails between Elad and Shaffer re Reena Mathew SC 8785
147.	Email Adriano to Hanes re Rev. Reena 90 Day Action Plan - 90 Day Check In SC 6452
148.	March 23, 2016 Meeting Recap SC 2422-2427
149.	90 Day Review SC 717-719
150.	Emails re Reena Mathew SC 1736 -1737

151.	Emails Mathew to Blackburn, Burns re Hello, plus the attachments M 322-24 [this is just the email – all of the attachments have been produced, they are Bates numbered, and the attachments will be included in this exhibit]
152.	Mathew's comments added to the March 23, 2016 Meeting Recap and the 90 Day Review SC 3544-3551
153.	Termination letter SC 5631
154.	EEOC Charge of Discrimination SC 102
155.	EEOC Determination Mathew 168-169
156.	EEOC Conciliation Failure and Notice of Rights SC 103-106
157.	Headcount emails and the attached spreadsheets (the pages included in ECF Doc. 35 and numbered App. 310-385)
158.	Documents showing YEI points awarded to Mathew Mathew 25-6
159.	YEI points charts from each party's summary judgment appendix ECF Doc. 25, App. 071-108 ECF Doc. 35, App. 386-387
160.	Medical records from 11/07/2106. SC 11365-11368
161.	2015 Annual Performance Review (Reena Mathew) SC 936-943
162.	Email from Boyd to Adriano re Early Departure SC 7650
163.	Messages between Boyd and Adriano re PTO Request SC 8387
164.	Emails between Adriano and Hullum re Reena SC 5678
165.	Emails between Boyd and Adriano re Tomorrow SC 8134
166.	Email from Elad to Adriano re today SC 9798
167.	Email from Boyd to Adriano re Today SC 10187
168.	Emails from Boyd and Adriano re PTO Update and Request SC 6898
169.	Email from Adriano to Mathew and Boyd re Yaeli SC 5542
170.	Demonstrative Aid – Timeline of events 2011-2016
171.	Demonstrative Aid – Timeline of the second PIP
172.	Demonstrative Aid re Headcount spreadsheets